Postal Regulatory Commission Submitted 9/13/2011 3:04:30 PM Filing ID: 75677 Accepted 9/13/2011

SMALL RURAL POST OFFICE SUCCESS September 13, 2011

Small rural post offices which have shown an increase in revenue over the past few years, which have shown an increase in the number of post office box rentals, and which a reduction of hours of operation would produce improvement of workload efficiency, should be immediately removed from the discontinuance list and continued without further delays. Delays in the decision making process are very stressful on residents and businesses in the community being considered for discontinuance, require excessive time and effort for gathering facts, necessitate time consuming submission of supportive evidence, mandate costly delivery of facts and evidence, and require substantial effort on the part of residents, businesses, postal employees, discontinuance officials, and other officials involved in the discontinuance procedural process. If a small rural post office such as in Jonesville, Texas 75659 has shown increases in revenue, increases in post office box rentals, and widespread community support, why would the United States Postal Service wish to proceed with the very costly procedures necessary for discontinuance?

The United States Postal Service has experienced financial difficulty and declines in mail volume. Many small rural post offices have also experienced financial difficulty and declines in mail volume. Both large and small post offices throughout this country have suffered decreased mail volume and financial difficulty. Reduction in hours of operation, elimination of Saturday service, and increased post office box rental fees could significantly improve financial and workload efficiency in some small rural post offices. If there is a solution which would produce more cost effective results, why not make a change promptly? If post office workload can be adjusted for the purposes of improving workload efficiency, why has USPS not made an adjustment in hours of operation immediately? Small rural post offices such as in Jonesville, Texas 75659 have been subjected to intensive discontinuance procedures on the basis of low workload when there is a viable means for improvement, and yet, USPS has not provided authorization for such changes to occur. Why? When there is a practical solution which could improve workload efficiency and when a community has stated that reduced hours of operation would not impose a significant burden, why does USPS not immediately approve the change which would help USPS? When such action is not employed, it creates questions in the minds of those communities which have been targeted. If ever the United States Postal Service needs support from communities across this country, it is now.

The discontinuance process requires accurate accumulation of community and post office facts and requires thorough evaluation of community and post office factors which contribute to the need for a small rural post office or the need for discontinuance. Official USPS reports and financial statements should reflect revenues, expenditures, projected estimates of cost savings and required expenditures should a post office be discontinued, projected estimates of cost savings and required expenditures should an alternative means of mail delivery be imposed on a community, and projected impacts on the postal employee(s) involved, projected impacts on the residents in the

community, projected impacts on the businesses in the community, and projected impacts on the surrounding area. If impacts outweigh the potential gains which could be produced by discontinuance, the discontinuance process should be stopped immediately. The United States Postal Service should mandate thorough research of small rural communities and the corresponding post offices prior to any recommendation for discontinuance. When a USPS Area Manager recommends a small rural post office for discontinuance, officially signs the recommendation, and submits the recommendation for discontinuance to the USPS District Manager, the Area Manager's initial decision should be based on factual information, accurate data, and truthful descriptions of the community being considered for discontinuance. If inadequate research has been conducted, if inaccurate information has been inserted, if untruthful information has been reported, the Area Manager does not have basis upon which to recommend the post office for discontinuance. It is inappropriate for any USPS official to make recommendation without justification and accurate basis. When a small rural post office such as in Jonesville, Texas 75659 has been recommended for discontinuance without documented basis for such recommendation, the discontinuance process should be immediately reversed. It should be unacceptable by USPS for any Area Manager to not have properly gathered accurate facts prior to submitting recommendation for discontinuance to a District Manager. It further should be unacceptable by USPS for any District Manager to sign approval of the recommendation for discontinuance without verifying that the facts contained in the Area Manager's report are factual. The United States Postal Service should grant all communities, both large and small, proper, fair, and honest consideration prior to subjecting citizens and businesses to the post office discontinuance procedure. Failure to act responsibly is detrimental to the public view of the United States Postal Service. Failure to act responsibly in the discontinuance process is a very serious matter which impacts citizens, businesses, and postal workers in communities which have suffered at the hands of inappropriate and inadequate management action and decision.

As the United States Postal Service moves forward, every effort must be made to insure that small rural communities are not victimized by inappropriate USPS action. Small rural post offices deserve fair consideration just as large community post offices. In many instances, small rural post offices are unique and are situated in geographically wide spread communities. Socio-economic, cultural, historical, environmental, and other such characteristics of small rural communities vary across the country. Regardless of geographical location or any community characteristic, all communities deserve and should be granted proper consideration. Without such consideration, communities can be negatively and severely impacted. The United States Postal Service is in a financial bind. This country has been in an economic crisis. Why target the small rural community post offices for discontinuance when there is a much larger cause of the USPS decline. Every effort must be made to protect the rural post office. Every effort must be made to insure that rural residents and rural businesses are not severely impacted by post office discontinuance. While it might be easy to discontinue small rural post offices and just tell residents and businesses in those small rural communities that they must now drive to another community for secure post office box mail retrieval or that they can put an unattended mail box up on the roadside, those

supposedly simple suggestions impose very significant burdens and risks on rural residents.

If a small rural post office has shown increases in revenue, increases in post office box rentals, has substantiated that crime is a true risk in their rural area, and the community served has stated that reduction of hours of operation would not severely impact mail retrieval, why discontinue the post office? The Jonesville, Texas Post Office 75659 has shown a 59% increase in revenue, has shown an increase in post office box rentals, has residents and businesses with expressed need and dependence on its post office, and has a community with historically significant sites and longevity. The United States Postal Service should encourage and celebrate such success and make every attempt to help sustain the post office by allowing a reduction in the hours of operation in order to improve workload efficiency rather than to carelessly allow a community to possibly lose its identity which historically has been supported by and has been dependent on a post office since January 18, 1847.

In order to substantiate great concern for what is happening in the discontinuance process in area and district offices of the United States Postal Service and in an effort to render support to small rural post offices which have been recommended for discontinuance, the following specific information is provided. Why was the Jonesville Post Office 75659 recommended for discontinuance? USPS Area and District officials have offered the following very specifically stated, but widely confusing and contradictory, statements as **the reason for being recommended for discontinuance**. Note the variance among the following statements.

- 1. decline in revenue and low workload
- 2. declining office workload
- 3. been in steady decline over the past several years
- 4. due to declining office workload revenue and/or volume this office has has been in steady decline
- 5. revenue has seen slight increase
- official USPS financial report showed increase in revenues by 59% over past few years.
 - Please note that the following additional two reasons were not provided by officials in letters of notification or discussions at the community meeting which was held to discuss the proposal to discontinue the rural post office
- 7. insufficient customer demand and office workload was noted in Area Manager's recommendation as submitted to the District Manager
- 8. vacancy in a small rural office was indicated after the community meeting in Area Manager's reply to comments made by residents on the official USPS questionnaire

When residents and businesses in a community are given such varied answers and contradictory reasons why the post office is being studied for discontinuance, where do concerned citizens turn for truth? Should residents rely upon contradictory statements by USPS officials? Should citizens challenge inaccurate, incomplete, incorrect, and inappropriate descriptions of their community? Should communities such as Jonesville,

Texas 75659 just ignore the obvious insufficient reports which have been used as the basis upon which area and district USPS officials have passed judgment resulting in recommendation for discontinuance? How could any USPS Area Manager not know that decline in revenue is contradictory with the facts his signature guarantees which show a significant 59% increase in revenues? Was there adequate preparation of fact? Was there sufficient research prior to making a serious recommendation for discontinuance? Was there adequate basis for a discontinuance recommendation? The concerned residents and businesses in Jonesville have had to submit proof of their community and its many attributes in order to correct and rectify the very unsatisfactory and insufficient reports prepared by the USPS. Those very unsatisfactory and shallow USPS definitions of the rural community of Jonesville cannot and should not be ignored. Although USPS Area, District, and Southwest Area Officials repeatedly have put into print and have stated in public that the final decision for discontinuance of Jonesville Post Office 75659 has not been made, one must question such statements since it is obvious that effort was not put forth by USPS officials to accurately accumulate true facts about the community prior to the initial recommendation.

When authorized USPS officials are granted authority and responsibility for fact gathering sufficient enough in nature for accurate decision making about serious matters such as discontinuance, are those authorized USPS officials held accountable for insufficient and inaccurate fact finding? When discovery shows that a small rural post office could be self-sufficient with simple reduction in hours of operation, should that rural post office be removed from the list of post offices being considered for discontinuance? If there is no true significant financial burden on the USPS and if a small rural community has shown support and need for its post office, should the post office be continued? The United States Postal Services must certainly owe its customers, employees, and community at large the highest degree of care and concern in proper record gathering and reporting. This is particularly true when lack of research, inadequate research, incomplete research, or faulty reports subject the public to stress, financial burden, time expenditures for substantiating worth, and unnecessary research and reporting in self-defense. If USPS Area and District officials had conducted appropriate research initially, had utilized known facts properly, and had carefully prepared an accurate report to serve as the basis for recommendation, Jonesville Post Office 75659 would most likely not have been recommended for discontinuance. Are other small rural communities being subjected to similar unfair and unsubstantiated circumstances?

How could USPS put an official document and proposal for discontinuance on display in a post office for public review which contains inaccurate data? As an example, the official document on display in the Jonesville Post Office 75659 reported that Jonesville has only one business when there are many? How could USPS report that the Jonesville community is comprised of 50% retirees and 50% commuters which is very incorrect and inappropriate and is very reflective of insufficient fact gathering.? There are residents who live and work in Jonesville. There are teenagers, children, preschoolers, and infants in Jonesville. Where do these residents fit within retiree and commuter categories? How could an official USPS financial statement contain

statements such as "revenue has been in steady decline" and in the very next paragraph report "Revenue has seen a slight increase?" How could that same financial statement show dollar amounts that confirm a 59% increase in revenue which seems more than steady decline and more than slight increases in revenue? These are all very serious questions which must be addressed by the United States Postal Service immediately. Are there other small rural communities being subjected to similar inconveniences and evaluations based on such inappropriate research and inadequate research reports?

There are major problems with the USPS discontinuance process currently being imposed on the Jonesville, Texas community and perhaps other small rural communities in the area and district. Who supervises area managers and district managers? Does USPS have realistic expectations of their officials who have been given such important authority and responsibility? Do area and district officials know how to research, gather, and evaluate important facts? Do area and district officials know the clients they serve? Have area and district officials been given a direct path to follow in discontinuing post offices located in rural areas without regard for those specific post offices having increased revenues, increased post office box rentals, and well defined community support? One would think that area and district officials would know the communities served, know the businesses served, know the general facts pertaining to the types of residents served, and know the post office facts. Modern technology available in most post offices provides opportunity for almost immediate reports of such things as post office box rentals to area and district officials. Reports should be current. Facts should be current. Every effort should be made to keep updated data accessible to those in very powerful positions to make recommendations for discontinuance or to make recommendations for continuance. If reports reflect outdated numbers, facts are outdated. It seems obvious that there is a marked difference between only 111 post office box holders as opposed to 127 post office box holders in a small rural community. If small rural post offices have had a postmaster vacancy for three years and USPS has not tried to fill the position, does that mean that USPS does not care, does not need to fill the vacancy, does not want to fill the vacancy, or is just waiting for the opportunity to discontinue the post office? If that vacant postmaster position is in a post office which is showing increases in revenue and increases in post office box rentals, does that reflect on the temporary postal employe, the community, or both? Does "increase" mean growth? Does "increase" warrant trying to fill a vacancy? Who makes that decision and upon what basis is such decision made? Why has that decision not been made?

If a small rural post office receives an offer for a significant fifty percent reduction in lease fees, should the United States Postal Service immediately respond? If a small rural post office being studied for discontinuance receives such an offer, should USPS immediately respond or wait until the study is completed? If upper management says that USPS is very careful to not enter into new lease contracts for post offices under study for discontinuance, does that take precedence over a district real estate agent who requests renegotiation? As an example, on August 12, 2011, lessor of the building which houses Jonesville, Texas Post Office 75659 called the Dallas Facilities Service Office and made an offer to reduce the rent by fifty percent. The offer was declined. On

August 22, 2011, the lessor reaffirmed the offer in a written letter to the Dallas Facilities Service Office. On September 2, 2011, USPS Vice President of Southwest Area Operations sent a letter to me, Lelia Vaughan, and for clarity, I am not the lessor. The letter written by Linda J. Welch stated:

"There are two reasons the USPS real estate specialist did not agree to renegotiate the lease terms: (1) The current term does not expire until 2015 and we are still working on leases for 2011, to 2013, and (2) Because this facility is identified on the Post Office discontinuance study list, until all the studies have been completed we are very careful not to enter into a new lease contract."

On September 12, 2011, I, Lelia Vaughan, received a call from someone named John Logan who stated that he was from the Facilities Service Office and that he wanted to discuss the offer that I had made relative to a reduction in the lease amount and to discuss renegotiating new lease terms. I explained that I was not the lessor nor had I made any offer of such nature, but that I had received a letter from the Southwest Area Office indicating that new lease contracts were not being considered because Jonesville Post Office 75659 is being studied for discontinuance. He firmly stated that the content of Linda Welch's letter did not have anything to do with the subject of renegotiating the current lease. Again, for clarity, I, Lelia Vaughan, am not the lessor even though Mr. Logan tried to assert that I was. Finally, he realized that I was not the lessor.

On September 13, 2011, I, Lelia Vaughan, received a letter from Allison Rizan, District Discontinuance Coordinator, in which she stated:

"Your letter to Mr. Bill McMurry, regarding the rent reduction is being reviewed at this time and the Real Estate Department will notify you when they have made their decision."

For clarity, I, Lelia Vaughan, am not the lessor, nor have I called, spoken to, or written any letter to anyone named Mr. Bill McMurry, nor have I made an offer to reduce the rent on a building housing the post office, nor have I ever entered into any contract for the purposes of renting/leasing a building to the USPS. Does USPS not know who has been and continues to be lessor for the building which houses the USPS Jonesville Post Office 75659 and has been lessor for at least 20 or more years? Is the USPS District Office so pressured to comply with the RAO Initiative N2011-1 that all district officials cannot remember or ascertain to whom USPS has been paying rent for all of these many years? This is just another example and evidence of inappropriate USPS handling of serious matters. Misinformed, unprepared, or unknowledgeable USPS officials have been trying to manage discontinuance matters pertaining to the study of Jonesville Post Office 75659. Are other small rural post offices being discontinued under the same confused state of affairs that seems to be impacting USPS area and district offices?

The RAO Initiative N2011-1 is a very serious matter which requires professional attention to details, accuracy, and truthful reporting of facts and circumstances. Small rural post offices being considered for discontinuance which have shown significant increases in revenue, which have shown increases in post office box rentals, which have community support for reduction in the hours of operation to improve workload efficiency, and which communities have been put in circumstances and whatever circumstances wherein full disclosure of true facts were not obtained and properly submitted by USPS officials and recorded in the official USPS Proposal for Discontinuance document, should be removed from the discontinuance list. With that said, United States Postal Service area and district officials should be held responsible and accountable for subjecting residents, businesses, and postal service employees to needless acts of interrogation, to needless acts of inappropriately addressed interrogation, to needless insufficient replies to questions asked, to needless inappropriate responses to concerns or comments, and to needless inconveniences required for proving a community's worth, proving the community's socio-economic, historical, cultural, and geographical description. Excessive time and money spent for needless reasons is a costly endeavor for not only the United States Postal Service but also the population served. The Jonesville, Texas Post Office 75659 is one such small rural post office which should be continued without further delay and inconvenience to the community. Are there others?

September 13, 2011 Lelia Vaughan